

United States District Court
District of Massachusetts

Civil Action
No.

Jeremy Morin
SHAWN INGLIS
Raymond Boissonault
Plaintiffs

v.

Dean Gray
Joe Ayala
Defendants

Complaint

Parties

1. Plaintiff, Jeremy A. Morin is An inmate currently housed at MCI Concord PO Box 9106 Concord, MASS 01742

Plaintiff, SHAWN INGLIS is an inmate currently housed at MCI Concord PO Box 9106 Concord, MASS 01742.

Plaintiff, Raymond Boissonault is an inmate currently housed at MCI Concord PO Box 9106 Concord, mass 01742

Defendant, Dean Gray is the superintendent at MCI Concord PO Box 9106 Concord, MASS 01742.

Defendant Joe Ayala is an IPS officer at MCI Concord PO Box 9106 Concord, mass 01742.

Both Defendants are being sued in their official and individual capacities.

Jurisdiction

This is a civil Action in Regards to Libel & slander, And Malice w/Forethought and the Plaintiffs' are seeking:

1. Declaratory Relief
2. compensatory Relief
3. Injunctive Relief
4. Nominal and Punitive Damages
5. Pain & suffering

This complaint will show that Both Defendants show the Total Disregard for a persons Mental Health And their Privacy that everybody is entitled to including the Plaintiffs.

Facts

1. Libel: Published Defamation which tends to injure a persons Reputation
2. slander: spoken Defamation that tends to injure A Persons Reputation

3 Reputation: Is what everybody has and is entitled to Have of their own Free Will.

4. Plaintiffs, Morin, Inglis, And Boissonault all suffer with serious mental illness and since they are in prison its become even worse By the Actions of Both Defendants.

5. Defendant, Dean Gray is sitting Back and letting Joe Ayala Ruin the Reputation of the Plaintiffs.

6. Defendant, Joe Ayala is Ruining The Reputation of the Plaintiffs Due to Vendetta towards Plaintiff Inglis And its trickling Down to the other Two (2) Plaintiffs', And MR Ayala is involving the mother of Plaintiff INGLIS By Putting His mother's Name in The DeReports of All 3 Plaintiffs'.

7. Both Defendants' Are also showing A Total Disregard For The Mental Health of All Three (3) Plaintiffs in Regards to Libel & Slander, AND The Defendants are acting in Malice aForthought

8. Both Defendants ARE ALSO Ruinning the Reputation of the Plaintiffs and their mental Health.

9. Defendant, Dean Gray is allowing Joe Ayala to do whatever He wants AND to control the Plaintiffs' By Any Means, AND it is a way to control the Plaintiffs AND Have them Act out so the Defendants Have a Reason to Gas them AND To Release their pent-up Anger towards the Plaintiffs AND anyone else who gets in the way of the Defendants.

10. For the Past 3 months this is what The Defendants Have Been

doing AND nobody has spoken-up until now, AND This has to stop or the Defendants will end-up killing someone AND make it Look like a suicide when in fact its murder, AND Look At what Happened to Aaron Hernandez who was murdered By (correctional) staff AND it was made to Look like a suicide when its not.

11. Plaintiff morin was A witness to the murder of MR Hernandez and Mr Morin Has kept His mouth shut until Now. And Mr Morin is Breaking his silence AND telling this court that He saw MR Hernandez Kill By Correctional officer (7) to Be exact, AND they All wore tactical gear to Hide themselves.

12 The Plaintiffs Are All very close Friends and they Look out for one Another.

13. The Plaintiffs are in Fear For their safety and Lives AND they Don't want to end-up like MR. Hernandez in the end.
14. It seems that the Defendants Don't and will never care AND Let the Plaintiffs suffer a Painful Death and then sweep it under the Rug Like the Killing of MR. Hernandez
15. Let me Reiterate that the Plaintiffs' are in Fear For their safety and Lives By Both of the Defendants and others, Etc.

Prayers For Relief

Wherefore, The Plaintiffs Respectfully pray That this Court enter a Judgment in their Favor effective immediately AND the Relief is As Follows:

1. Grant All 3 Plaintiffs immediately Release From prison effective immediately, AND
2. GRANT Plaintiffs a declaration That the Acts and omissions Described HEREIN violate their rights that they are entitled to under the United States AND MASSACHUSETTS constitutions, AND
3. A Protection ORDER AND temporary Restraining Against the DEFENDANTS and other in the Department of corrections AS A whole, AND
4. Grant Plaintiffs compensatory Damages in:
 - A. Jeremy morin \$ 200,000
 - B. Shawn Inglis \$ 200,000
 - C. Raymond Boissonault \$ 200,000
5. Plaintiffs seek Punitive damages in the following Amounts AND they ARE as follows:

- A. Jeremy Morin - \$100,000
- B. Shawn Inglis - \$100,000
- C. Raymond Boissonault - \$100,000

6. Plaintiffs also seek the Recovery of the cost for this Suit/Action, and

Any additional Relief this Court deems Just, proper, and Equitable.

Respectfully submitted

Jeremy Morin
Shawn Inglis
Raymond Boissonault

executed on: 3-8-24

Under the pains and Penalties of perjury.